UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

WEIR & PARTNERS LLP

A Pennsylvania Limited Liability Partnership 457 Haddonfield Avenue, Suite 420

Cherry Hill, New Jersey 08002

Tel: (856) 740-1490 Fax: (856) 740-1491

Jennifer Hiller Nimeroff, Esquire (JN-2925)

Counsel for Defendant, PNC Bank, N.A.

In Re:

Chapter 7

CRYSTAL RAMIREZ,

CRYSTAL RAMIREZ,

Judge: Hon. Kathryn C. Ferguson

Case No.: 12-34475

Plaintiff,

Debtor.

PNC BANK, N.A.,

Defendant.

Adversary Pro. No.: 13-01992-KCF

STIPULATION EXTENDING TIME FOR DEFENDANT, PNC BANK, N.A., TO RESPOND TO COMPLAINT

Plaintiff, Crystal Ramirez ("Plaintiff"), by and through her attorneys, Law Offices of Michelle Labayen, P.C., and Defendant, PNC Bank, N.A. ("Defendant" or "PNC"), by and through its attorneys, Weir & Partners LLP, agree that Defendant shall have until November 22, 2013 to file and serve a response to Plaintiff's complaint.

The parties hereto acknowledge that no prior extension has been granted to Defendant.

[Signatures Appear On Following Page]

LAW OFFICES OF MICHELLE LABAYEN PC

WEIR & PARTNERS LLP

By: /s/ Michelle Labayen

Michelle Labayen, Esquire One Gateway Center 26th Floor Newark, New Jersey 07102 Attorneys for Plaintiff, Crystal Ramirez By: /s/ Jennifer Hiller Nimeroff
Jennifer Hiller Nimeroff, Esquire
457 Haddonfield Avenue
Suite 420
Cherry Hill, New Jersey 08002
Attorneys for Defendant,
PNC Bank, N.A.

Date: November 7, 2013